

9041 Executive Park Drive  
Suite 401  
Knoxville, TN 37923  
(615) 691-5052  
Fax (615) 691-6485

November 23, 1992

Mr. Fred B. Stroud - OSC  
USEPA Region IV  
345 Courtland St. NE  
Atlanta, GA 30365

Subject: Saad Trousdale Drive Site  
Expansion of Drum Search

Dear Mr. Stroud:

This confirms our conversations of November 16 and 17, 1992 regarding expansion of the drum search/trenching activities currently being conducted at the Saad Trousdale Drive Site in Nashville, TN. In conformance with Section VI Paragraphs 17 and 18 of Administrative Order by Consent (AOC) and with Section 6.4 of the approved Removal Action/Field Investigation (RA/FI) Phase II Work Plan concerning supplemental activities, this will serve to confirm your verbal approval of the Saad Site Steering Committee's intent to perform additional drum search activities on the western portion of the Saad property. Details of the expanded drum search and the rationale for modification to the drum search work are provided below. As we discussed, the activities described below began 18 November 1992 and be completed prior to resuming work on the Oil/Water Separator trench.

#### BACKGROUND

During the performance of RA/FI Phase I activities in 1991 a total of five (5) drums were encountered in the excavation of 100 linear feet of trench. These drums were in various stages of deterioration and contained minor quantities of material. The discovery of these drums led to the inclusion of Drum Search/Site Characterization activities as part of the Administrative Order by Consent (AOC) required RA/FI Phase II Work Plan. During the RA/FI Phase II drum search, a total of 24 drums have been discovered. All these drums have been removed, sampled, overpacked and are being stored on-site until analytical data are received. All drums that have been discovered, the five in 1991 and the 24 during this year's work, were found on the western perimeter of the Saad property at depths less than 10 ft. A map illustrating the location of all drums that have been discovered at the site in relation to areas that have been trenched or excavated is being prepared as you requested. The map will show that much of the site has been explored (Empe, 1991; DRE, 1991; and DRE, 1992) during various phases of work and that intact drums have only been found along the western boundary of the Saad property.



Saad Trousdale Drive Site  
November 23, 1992  
Page 2 of 3

The discovery of drums only along the western boundary of the site is better understood upon the viewing of historical aerial photographs of the site and vicinity. Aerial photos show that in the early 1950's the site vicinity was simply a vacant field or farmland; no surface features were present. During the mid- to late-1950's the site was excavated. An aerial from 1957 shows a circular excavation with tailings around the circumference of the hole. The purpose of the excavation is unknown. By April, 1963 the circular excavation had been filled and an operation (apparently a cement company) is present to the south of the site (present area of Franklin Brick). An aerial from February 1967 shows that circular fill area (now with more vegetation) and also shows an excavation trench. The excavation trench extends north-south between the CSX railroad berm and the circular fill area. The purpose of this excavation trench is unknown. Aerials from 1969 and 1973 show that the trench remained open. The trench was filled during the operations of John Saad & Sons and during the construction of the Franklin Brick building.

Based on the aerial photographs and subsequently confirmed by soil borings and trenching operations, the circular area of fill (which covers the majority of the Saad Site) consists of large boulders and other materials. These materials were deposited in their current configuration in the late 1950's or early 1960's. The area along the western boundary of the site was not filled until the mid- to late-1970's and possibly the early 1980's. It is logical that if drums were to be disposed/buried at the site that the open excavation trench would be the likely area. It seems unlikely that the circular fill area of large boulders would have been excavated when an open ditch was available.

#### EXPANDED DRUM SEARCH PLAN

An additional trench will be excavated along the western edge of the site for the sole purpose of drum search and removal. Additional site characterization work in this trench will not be performed. This trench will parallel the Saad Site trench that was recently excavated along the boundary between the Saad property and the CSX railroad berm. The proposed trench will be located approximately 10 ft east of the previous excavation and will extend approximately 100 linear ft to a depth of 10 ft (the depth limit of drums found at the site). The trench will be approximately 2 trackhoe buckets in width. If drums are discovered during trenching, they will be removed, sampled, overpacked and disposed of with your approval at an appropriate facility. Further, if a drum or drum remnants are encountered in the proposed trench, the trench will be extended by 1 trackhoe bucket width to either side of the drum. If no

*de maximis*

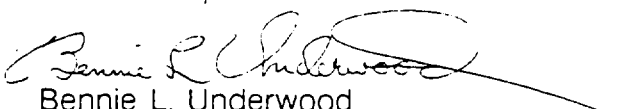
Saad Trousdale Drive Site  
November 23, 1992  
Page 3 of 3

other drums are found at that location, the trenching will continue until the aforementioned dimensions are reached.

Thank you for your prompt review and approval of our proposed course. As you are aware, the trench that is currently being excavated into the former Oil/Water Separator (OWS) system area has encountered water. While arrangements are being made for the disposal of liquids that have been removed from the OWS excavation and alternatives to complete the work in the OWS area are being evaluated, we will complete the supplemental drum search activities. Your approval allows the continued implementation of the Work Plan without any down-time, although the Work Plan completion schedule will be extended by the period required to perform this additional drum search.

Your signature at the bottom of this letter will fulfill the requirements of the AOC. Please return a copy to me following your review and execution. In accordance with the AOC this agreed modification to the Work Plan effectively amends the AOC. If you or your staff have any questions regarding this correspondence or the expanded drum search, please contact me at (615) 691-5052.

Best regards,  
de maximis, inc.

  
Bennie L. Underwood  
Project Coordinator

cc: Beth Davis - ORC  
Saad Site Executive Committee

Approved and Agreed to:

\_\_\_\_\_  
Fred B. Stroud, USEPA - OSC

BU/lah

File Drum.ltr\3034